legal. *Trist* v. *Child*, 21 Wall. (U. S.) 441; *Rhodes* v. *City of Tacoma*, 97 Wash. 341; 166 Pac. 647; *Kaufman* v. *Catzen*, 94 S. E. 388 (W. Va.). Contracts directly or indirectly interfering with the administration of justice are also against public policy. *Holsberry* v. *Clark*, 242 Fed. 831; *Ives* v. *Culton*, 197 S. W. 619 (Tex. Civ. App.). However, the paramount public policy is to enforce contracts as made. Accordingly the courts hesitate to declare contracts invalid. *Cf. Cherry* v. *City State Bank*, 159 Pac. 253 (Okla.); *Stuart* v. *Greenbrier County*, 16 W. Va. 95. Especially is this true of contracts alleged to be in unreasonable restraint of trade. *Cf. Ford Motor Co.* v. *Boone*, 244 Fed. 335 (1917). But where the purpose or necessary effect of a contract is to corrupt government, or clearly to embarrass the activities of the state in war or peace, it would seem from the above examples to be unenforceable as against public policy. Although unique in its facts, the principal case clearly comes within this principle.

CONTRIBUTORY NEGLIGENCE — DEGREE OF CARE REQUIRED OF CHILDREN — EVIDENCE OF PERSONAL ABILITY. — Children found dynamite caps in a locker of a steam shovel on the railroad's right of way in a lonesome place in the woods. While the plaintiff, a thirteen-year-old boy, was hammering a cap it exploded and he was injured. *Held*, on the question of contributory negligence, evidence of his scholarship and knowledge of right and wrong was admissible. *Farrand* v. *Houston & T. C. R. Co.*, 205 S. W. 905 (Tex.).

A landowner owes no duty to an unperceived, unanticipated trespasser, which was the status of the plaintiff in the present case. *Wilmes* v. *Chicago Gt. Western Ry. Co.*, 175 Iowa, 101, 156 N. W. 877; *Pastorello* v. *Stone*, 89 Conn. 286, 93 Atl. 529. Moreover, this case is not within the attractive nuisance theory because the alleged attractive machinery, the steam shovel, located in a secluded place, did not cause the injury. *McDermott* v. *Burke*, 170 Ill. App. 415, 100 N. E. 168. And see *O'Connor* v. *Brucker*, 117 Ga. 451, 453, 43 S. E. 731, 732. Aside from the attractive nuisance theory, American courts establish a minimum age as to capacity for contributory negligence; or follow the Roman theory of a conclusive presumption of incapacity for contributory negligence below seven years, and a tentative presumption from seven years to fourteen; or else the courts decide each case on its merits. *Casper* v. *Geck*, 185 Ill. App. 155; *Chicago, Rock Island, & Pacific Ry. Co.* v. *Wright*, 161 Pac. 1070 (Okla.); *Thomas* v. *Oregon Short Line R. Co.*, 47 Utah, 394, 154 Pac. 777. While logically a child *sui juris* should be held to the degree of care of the ordinary reasonable child of its age, the growing tendency is to consider the abilities and experience of each child in determining the degree of care required of him. *Illinois Iron & Metal Co.* v. *Weber*, 196 Ill. 526, 63 N. E. 1008. In admitting evidence of the plaintiff's scholarship and knowledge of right and wrong the court follows this tendency.

CORPORATIONS — STOCKHOLDERS: INDIVIDUAL LIABILITY TO CORPORATION AND CREDITORS — EFFECT OF OWNERSHIP OF ENTIRE STOCK BY ANOTHER CORPORATION — SUBSIDIARY CORPORATIONS AS AGENTS. — A railway company owned the entire stock in a coal company. Of necessity the whole output of the coal company was shipped over said railway company's lines, and there were various contracts relating thereto. A mortgage on the coal company's property was foreclosed and a deficiency judgment rendered. Holders of the bonds, secured by the mortgage, set up this judgment as a claim against the railway company. *Held*, that the railway company is not liable. *New York Trust Co.* v. *Carpenter*, 250 Fed. 668 (C. C. A., 6th Circuit).

For a discussion of this case, see NOTES, page 424.

CRIMINAL LAW — ATTEMPTS — THE ESPIONAGE CASES. — The postmaster of the city of New York, under Title 12, Section 1 of the Espionage Act of